

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

**XAVIER VILARO, MYRNA CANO AND
THE CONJUGAL PARTNERSHIP
COMPOSED BY THEM**

Plaintiffs,

v.,

**SONIC CAVITATION LIMITED; SONIC
CAVITATION, LLC; XYLEM INC;
TOTAL MACHINE SOLUTIONS, LLC.
AND WILDCAT ENGINEERING, INC.;
CORPORATION X, CORPORATION Y,
AND JOHN DOE.**

Defendants.

Civil No. 16-cv-02059 ()

BREACH OF CONTRACT

**MOTION FOR LEAVE TO FILE SPANISH LANGUAGE DOCUMENTS AND
EXTENSION OF TIME TO FILE CERTIFIED TRANSLATIONS**

TO THE HONORABLE COURT:

COMES NOW, Defendant **Xylem, Inc.** (“Xylem”), without submitting itself to the jurisdiction or venue of this Court nor waiving any defense, and through the undersigned attorneys, and respectfully states and prays as follows.

1. On this same date, Xylem has filed a notice of removal (the “Notice”) in the above captioned case. See, Docket 1.
2. In the Notice, Xylem included the original complaint and original summons, drafted in the Spanish language. Xylem intends to file certified translations of each document originally filed in the Spanish language.

3. Pursuant to Local Rule 5(g), Xylem respectfully requests leave to file the certified translation of the Spanish language documents and a twenty (20) day extension of time to file the certified translation. The filing of the certified translations would be due on June 29, 2016.

WHEREFORE, it is respectfully requested that this Honorable Court grant the instant motion (1) allowing Xylem leave to file in the Spanish language and (2) affording Xylem an extension of time of twenty (20) days, to run until June 29, 2016, to file the certified translations of such Spanish language documents.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 9th day of June, 2016.

I HEREBY CERTIFY that, on this same date the foregoing was filed with the Clerk of the Court using the CM/ECF system, which will send notification to all attorneys of record.

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